

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Nicholas Schwab, Individually, as son and)	
Independent Administrator (petitioned for))	
of the Estate of Alivia Schwab, deceased,)	
)	No. 23 CV 16607
Plaintiff,)	
)	
vs.)	
)	
MORRIS POLICE OFFICER NICHOLAS)	
PAMPINELLA; MORRIS POLICE OFFICER)	
CASIE PRICE; individually, and as employees/)	
agents of the City of Morris; and THE CITY)	JURY DEMANDED
OF MORRIS, a Municipal Corporation,)	
)	
Defendants.)	

AGREED MOTION FOR ENTRY OF CONFIDENTIALITY ORDER

NOW COME the Defendants OFFICER NICHOLAS PAMPINELLA, OFFICER CASIE PRICE and THE CITY OF MORRIS, by and through their attorneys, MICHAEL D. BERSANI and G. DAVID MATHUES of HERVAS, CONDON & BERSANI, P.C., and move this Court to enter a Confidentiality Order. In support, Defendants state the following:

1. The parties are engaged in discovery pertaining to Plaintiff's complaint in the above-captioned matter.
2. In the course of such discovery, the parties may seek to obtain discovery of information that either party might consider to be confidential.
3. As such, there is a need to apply to the Court for an order limiting the disclosure of such confidential information.
4. Rule 26(c) of the Federal Rules of Civil Procedure provides for the issuance of protective orders limiting the disclosure of discovered information in appropriate circumstances.

5. The proposed Confidentiality Order has been separately submitted to the Court's Proposed Order electronic mailbox. The Order governs these parties' use of confidential records and information contained therein. The Order is based on the Model Order found on the Northern District's website.

6. The undersigned has met and conferred with Plaintiff's counsel as to this motion and the proposed order, and he has no objection to entry of the proposed Order.

WHEREFORE, the Defendants respectfully requests this court grant this Motion for entry of a Confidentiality Order.

Respectfully submitted,

s/ Michael D. Bersani

Michael D. Bersani, Atty Bar No. 06200897

Attorneys for Defendants

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CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2024, I electronically filed the foregoing **Defendants' Agreed Motion for Entry of Confidentiality Order** with the Clerk of the U.S. District Court for the Central District of Illinois, using the CM/ECF system, which will send notification to the CM/ECF participants:

TO: Jeffrey J. Neslund
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s/ Michael D. Bersani
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